

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,

Plaintiff,

v.

HARRY M. FREEDMAN, M.D.,  
DONNA BURNS, DR., and  
MAJOR R. L. HUGHES,

Defendants.

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C.A. No. 04-1205-SLR

TRIAL BY JURY OF  
TWELVE DEMANDED

**DEFENDANT HARRY M. FREEDMAN, M.D.'S  
RESPONSE TO PLAINTIFF'S MOTION**

COMES NOW, defendant Harry M. Freedman, M.D. (hereinafter referred to as "Dr. Freedman"), by and through undersigned counsel, hereby responds to plaintiff's Motion docketed on June 26, 2006, and states as follows:

1. This Motion is unintelligible. Accordingly, Dr. Freedman is unable to file a response thereto.

ELZUFON AUSTIN REARDON  
TARLOV & MONDELL, P.A.

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DATE: June 28, 2006